

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION**

AMERICA FIRST LEGACY PAC,	)	
	)	CIVIL ACTION NO.:
	)	
Plaintiff,	)	
	)	
v.	)	<b>JURY TRIAL DEMANDED</b>
	)	
ANGIE WONG,	)	
	)	
Defendant.	)	
_____	)	

**MOTION TO DISMISS COUNTS ONE AND TWO AND A  
PORTION OF COUNT FIVE FOR FAILURE TO STATE A CLAIM**

Defendant Angie Wong, by and through her undersigned counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby moves to dismiss Counts 1 and 4 and a portion of Count 5 of Plaintiff's Complaint. A brief supporting this motion is being filed contemporaneously herewith.

Dated: November 3, 2023

Respectfully submitted:

**ICHTER DAVIS LLC**

By: /s/ James W. Hawkins

**JAMES W. HAWKINS**

Georgia Bar No. 338767

**CARY ICHTER**

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*Counsel for Defendant*

**CERTIFICATION**

In accordance with LR 5.1C, ND GA, I hereby certify that this document has been prepared in 14 point, Century Schoolbook font.

Dated: November 3, 2023.

/s/ James W. Hawkins  
James W. Hawkins

**CERTIFICATE OF SERVICE**

I hereby certify that the within and foregoing **Motion to Dismiss Counts One and Two and a Portion of Count Five for Failure to State a Claim** was served by email to counsel of record for Plaintiff America First Legacy PAC:

Jared B. Craig, Esq.  
20 Baker Road, Suite 5  
Newnan, Georgia 30265  
Pdc.jbc@gmail.com

Dated: November 3, 2023.

/s/ James W. Hawkins  
James W. Hawkins